

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:

RYAN W. MONTGOMERY and  
AMY L. MONTGOMERY,  
Debtors.

RONDA J. WINNECOUR,  
Chapter 13 Trustee,  
Movant

vs.

STANDARD BANK PaSB, by assignment  
of Sail Mortgage Corp.,  
Respondent.

Case No.: 20-21256-CMB

Chapter 13

Related to Doc. 66

**RESPONSE TO TRUSTEE'S MOTION TO PRECLUDE POSTPETITION  
MORTGAGE FEES, EXPENSES AND CHARGES**

AND NOW, comes the Respondent, Standard Bank PaSB, by assignment of Sail Mortgage Corp., by and through its counsel, Ryan G. Lemke, Esquire, and the law firm of Hergenroeder Rega Ewing & Kennedy, LLC, and files the following response:

1. Respondent, Standard Bank PaSB, by assignment of Sail Mortgage Corp. ("Standard Bank"), is the holder of a first lien Mortgage on the Debtors' residence located at 1219 McEwen Avenue, Canonsburg, PA 15317.
2. Standard Bank consents to the Trustee's Motion and agrees to withdraw claim for Postpetition Mortgage Fees, Expenses and Charges.

Respectfully submitted,

HERGENROEDER REGA  
EWING & KENNEDY, LLC

Dated: May 20, 2021

By:           /s/ Ryan G. Lemke            
Ryan G. Lemke, Esquire  
PA Id. No.: 201118

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Pittsburgh, PA 15222  
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*Counsel for Creditor, Standard Bank PaSB,  
by assignment of Sail Mortgage Corp.*

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**CERTIFICATE OF SERVICE**

I certify that the foregoing **Response To Trustee's Motion To Preclude Postpetition Mortgage Fees, Expenses and Charges** has been served by U.S. First Class Mail, postage pre-paid, on the following at the addresses below:

Brian C. Thompson, Esquire  
THOMPSON LAW GROUP, P.C.  
125 Warrendale Bayne Road, Suite 200  
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*Counsel for Debtors*

Ronda J. Winnecour  
US Steel Tower  
600 Grant Street, Suite 3250  
Pittsburgh, PA 15219  
*Chapter 13 Trustee*

Ryan W. Montgomery and  
Amy L. Montgomery  
1219 McEwen Avenue  
Canonsburg, PA 15317  
*Debtors*

Joseph S. Sisca, Esquire  
Assistant U.S. Trustee  
Office of the United States Trustee  
Liberty Center  
1001 Liberty Avenue, Suite 970  
Pittsburgh, PA 15222  
*U.S. Trustee*

Respectfully submitted,

HERGENROEDER REGA  
EWING & KENNEDY, LLC

Dated: May 20, 2021

By:           /s/ Ryan G. Lemke            
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